

Hearing Date and Time: June 29, 2010 at 9:45 a.m. (Prevailing Eastern Time)

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11  
: Case No. 09-50026  
MOTORS LIQUIDATION COMPANY, *et al.*, : (Jointly Administered)  
f/k/a General Motors Corp., *et al.*, :  
Debtors. : Honorable Robert E. Gerber  
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**FEE EXAMINER'S SUPPLEMENT TO STATEMENT OF LIMITED OBJECTION TO  
SECOND INTERIM FEE APPLICATION OF THE CLARO GROUP**

**TO: THE HONORABLE ROBERT E. GERBER  
UNITED STATES BANKRUPTCY JUDGE**

The Fee Examiner of General Motors Corporation (n/k/a Motors Liquidation Company), appointed on December 23, 2009 (the “Fee Examiner”), submits this *Supplement to Statement of Limited Objection (“Supplement”)* in connection with the *Second Interim Application of The Claro Group, LLC for Allowance of Compensation and Reimbursement of Expenses for the Period October 1, 2009 through January 31, 2010* [Docket No. 5290] (the “Second Fee Application”). With this Supplement, the Fee Examiner reduces the recommended disallowances for certain objectionable fees requested in the Second Fee Application to an

aggregate disallowance of \$6,121.30, based upon additional explanations provided by The Claro Group, LLC (“**Claro**”). The Fee Examiner respectfully represents:

### SUMMARY STATEMENT

The *Fee Examiner’s Report and Statement of Limited Objection to the Second Interim Fee Application of The Claro Group* (the “**Initial Report**”) [Docket No. 6094] summarized the Fee Examiner’s analysis in support of a suggested disallowance of \$15,856.30 in fees. Most of those recommended reductions were attributable to the improper use of time increments in billing and vague communications. Claro has acknowledged the improper use of time increments. However, it has provided detail related to the billing entries for one particular timekeeper sufficient to justify a reduction in the suggested disallowance. With this adjustment, Claro accepts the Initial Report.

### COMMENTS

On June 22, 2010, the Fee Examiner filed the Initial Report. Claro contacted counsel to the Fee Examiner and provided further information on June 23, 2010. All of the information provided by Claro has been considered by the Fee Examiner.

As a result of the telephone call on June 23, and a follow-up call on June 24, the Fee Examiner has reduced the suggested disallowance for billing in improper time increments to the agreed reduction of \$4,867.50.

Claro has agreed to the suggested disallowances for clerical and administrative charges (\$584.55), vague tasks (\$419.25), and double billing (\$250.00), as set forth in the Initial Report.

***Total fees suggested for disallowance: \$6,121.30.***

***Total expenses suggested for disallowance: \$0.00.***

***Total fees and expenses recommended for disallowance: \$6,121.30.***

## CONCLUSION

WHEREFORE, the Fee Examiner respectfully submits this *Supplement to Statement of Limited Objection.*

Dated: Green Bay, Wisconsin  
June 25, 2010.

GODFREY & KAHN, S.C.

By: /s/ Carla O. Andres  
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